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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

RAHMAN ABDUL,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

Thomas Christian, being duly sworn, deposes and states that he is a Special Agent with the United States Department of State, Diplomatic Security Service ("DSS"), duly appointed according to law and acting as such.

Upon information and belief, on or about July 19, 2012, within the Eastern District of New York, the defendant Rahman Abdul, did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546)

The source of your deponent's information and the grounds for this belief are as follows:¹

¹ Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.

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C O M P L A I N T

(T. 18 U.S.C. § 1546)

1. I have been a special agent with the DSS for approximately 8 months. My information comes from a joint investigation of the DSS and the United States Customs and Border Protection agency ("CBP"). I have spoken with CBP agents, interviewed the defendant and reviewed documents.

2. On July 19, 2012, the defendant RAHMAN ABDUL arrived at John F. Kennedy International Airport on Air India Airlines, Flight No. AI 101 from India. Upon arrival, the defendant presented to a CBP officer a valid India passport # H1676084, issued on July 11, 2008. The passport contained a B1/B2 visa, Visa Foil No. 97900638, issued by February 23, 2009.

3. After presenting the passport and visa, the defendant was selected for a secondary inspection by CBP officers because a computer database indicated that he was a match to a lookout in the Treasury Enforcement Communications System (TECS) indicating that he provided fraudulent documents to a U.S. Embassy to obtain a U.S. Visa.

4. When the defendant applied in 2009 for the visa in India, the defendant indicated that he was coming to the United States on a business trip to Delaware for meetings and that he had been employed at Infrascap Technologies for four years. On February 23, 2009 the defendant was issued a U.S. B1/B2 non-immigrant visa. On April 3, 2009, the American Consulate in Chennai, India (the "American Consulate") placed calls to Infrascap Technologies concerning the defendant's employment.

According to the Vice President of Infrascap Technologies, the defendant was never employed at the company. The American Consulate revoked the defendant's visa on April 3, 2009.


4. During the secondary inspection on July 19, 2012, the defendant RAHMAN ABDUL stated that he was coming to the United States for a short vacation to visit a friend. He further stated that he currently works for a company named Moon Eventz as a creative art director and that he previously worked for Infrascap Technologies.

5. The defendant RAHMAN ABDUL was informed that the American Consulate did not believe he ever worked for Infrascap Technologies. The defendant RAHMAN ABDUL subsequently admitted that he indeed never worked for Infrascap Technologies in any capacity and that he paid a visa vendor for assistance in completing his visa application.

6. The defendant RAHMAN ABDUL was then notified of his Miranda rights, which he waived. The defendant then stated, in sum and in substance and in part, that he was never employed at Infrascap Technologies in any capacity, and that during the time of the visa application he was self-employed as a garment wholesaler working from his home. The defendant stated that he paid a vendor, Ayaz Sabri, approximately 1 Lakh 20,000 Rupees for assistance in obtaining his U.S. visa. The defendant stated that Ayaz Sabri completed his visa application and he was given paperwork on Infrascap letterhead as well as bank documents and

an identification card from Infrascap. The defendant also stated that Ayaz coached him on how to answer questions from U.S. Consular Officers at the embassy.

WHEREFORE, your deponent respectfully requests that the defendant RAHMAN ABDUL be dealt with according to law.


Thomas Christian
Special Agent
U.S. Department of State
Diplomatic Security Service

Sworn to before me this

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